

FOR THE FAR EAST

- 1 -

Paper No. 567

THE UNITED STATES OF AMERICA, et al

- vs -

ARAKI, Sadao, et al

- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES AND DOCUMENTS

1. NOW COMES TOJO, HIDEKI by his counsel of record and respectfully requests the Tribunal, in accordance with Section 3, Article 9, Paragraph 3 of the Charter and pursuant to the order of the Tribunal, dated at Tokyo, Japan on the 24th day of October, paper bearing No. 492 to order the production of the following witnesses and documents necessary for his defense;

1. SUZUKI, Kentaro - No. 737 Sakiyado - machi, Higashi-Katsushika Gun, Chiba, Prefecture, Prime Minister September, 1945.

- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify to the facts pertaining to the acceptance of surrender and the understanding of the Cabinet Council as to their understanding of the terms there under.

2. OKADA, Tadahiko - 19 Nakano - cho, Azabuku, Tokyo. Welfare Minister in September 1945 and formerly speaker of the House of Representatives.

- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify as a member of the Suzuki Cabinet to the acceptance of the Potsdam Declaration and the understanding of the cabinet as to the meaning of the terms there under. He will also be able to testify regarding the nature and purposes of the Imperial Rule Assistance Association and the Imperial Rule Political Assistance Society.

3. OHTA, Koso - Education Minister in September 1945. At present confined in Sugamo Prison.

- (a) The nationality of the witness is Japanese;

- 1 -

- (b) This witness will be able to testify as a member of the Suzuki Cabinet and with regard to the understanding as to the terms of the surrender. The witness will also be able to testify regarding the fundamental principles of Japanese education and to the objects and purposes of military training in Japanese schools. Further he will be able to testify as to the nature and purposes of various organizations and associations.
4. SHINOBU, Dzunpei - Kashiwas - machi, Chiba Prefecture. International lawyer and member of the Imperial Academy.
- (a) The nationality of the witness is Japanese;
- (b) This witness will be called for the purpose of testifying as to the understanding of the term "war criminals" among Japanese lawyers.
5. IWATA, Ainosuke - No. 8 Shirokane - daima-chi 1 chome, Shinbaku, Tokyo. Leader of "Aikoku-sha."
- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify as to the aims and purposes of various organizations existing prior to the war and also to the facts concerning the "March Incident" and "October Incident."
6. WACHI, Takaji - In Sugamo Prison but at present taken to the Philippines as witness in war crimes trials.
- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify to the true nature and aims of "Sakura-Kai" and also the facts concerning the March and October Incidents.
7. HIGUCHI, Ki-ichiro - 718 Den-en-chofu, 3 chome, Setagaya-ku, Tokyo. Former Lieutenant General.
- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify as to the aims and purposes of various organizations and associations and particularly with reference as to the formation and membership of the "Sakura-Kai."
8. KOCA, Kiyoshi - Nakameguro, Meguroku, Tokyo. Former navy lieutenant.
- (a) The nationality of the witness is Japanese;



- (b) This witness will be able to testify in connection with the assassination of Premier Inugai and as to the events pertaining to and involved in said affair.
9. TSUGITA, Daizaburo - 41 Ohtsuka Nakamachi, Koishigawa-Ku. Chief of Legislative Bureau in Hirota Cabinet and at present State Minister of the Yoshida Cabinet.
- (a) The nationality of the witness is Japanese;
- (b) This witness will testify concerning the Japanese system of the War and Navy Ministries and as to their selection and as to changes taking place in that system.
10. YOSHITADA, Wagata - 3 Hisaki, Zushi-cho in the city of Yokosuka. Former chief of the moving picture section of the Osaka Mainichi.
- (a) The nationality of the witness is Japanese.
- (b) This witness will be able to testify concerning the production of "Japan in Emergency" and the facts pertaining to the authorization of said production.
11. IKEZAKI, Chuko - Sugamo Prison. Formerly member of House of Representatives and also Editor in political matters.
- (a) The nationality of the witness is Japanese;
- (b) This witness will testify to relevant facts concerning Japanese political parties and formation of cabinets.
12. SHIMADA, Tosio - 158 Kogai-cho Azabuku, Tokyo. Former speaker of House of Representatives and several times cabinet minister.
- (a) The nationality of the witness is Japanese;
- (b) This witness will be able to testify on general party politics and with regard to facts concerning the formation of cabinets since the Meiji Era.
13. MORIYAMA, Eiichi - 1075 Hiratsuka 7 chome, Ebaraku, Tokyo. Former president of legislative board.
- (a) The nationality of the witness is Japanese;
- (b) This witness will testify relative to constitutional organization and practices in Japan specifically as to the division of functions and responsibilities by the War Ministry and Chief of Staff.

14. OKADA, Kikusabro - (Address to be supplied) Former Major General and former official of Cabinet Planning Board.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify concerning the aims and purposes of the Five Year Plan of 1939.
15. MATSUDA, Reikichi - (Address to be supplied) Official in Cabinet Planning Board.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify as to the aims and objectives of the Board during the years 1937-1941.
16. KISHI, Shinsuke - Now in Sugamo Prison. Former Minister of Commerce and Industry and served as Official in Manchoukuo.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify regarding the aims and objectives for development of industry in relationship to the China Incident.
17. IIMURA, Minoru - 50 Soshigaya 2 chome, Setagaya-ku, Tokyo. President of "Total War Research Institute"
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify as to the nature and operation of the Institute.
18. ANDO, Kisaburo - Now in Sugamo Prison. Former president of "Imperial Rule Assistance Society"
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify to the relevant facts concerning the nature and objectives of the fore said society.
19. OASA, Tadao - Meiji Club, Nakadori No. 11 Maruno-uchi, Koji-machi-ku, Tokyo. Former director of Imperial Rule Assistance Political Society. He was also state minister in Koiso Cabinet.
- (a) The nationality of the witness is Japanese;
  - (b) This witness is able to testify to facts concerning the nature and objectives of the said society and the relationship between that society and the Tojo Cabinet.



20. YUZAWA, Michio - 228 Yoyogi-Sanya, Shibuyaku, Tokyo.  
Home Minister in Tojo Cabinet.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify as to the principles of the Tojo Cabinet as concerns the question of public relations.
21. KOMAI, Tokuzo - Horinouchi Namamura, Sakagun, Gunma Prefecture. Former president of General Affairs Bureau of Manchukuo.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify regarding the political position of Manchukuo as an independent state.
22. KANAI, Shozi - City of Ueda, Nagano Prefecture. Formerly an official of Manchukuo and Menshen Administrative Council.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify to economic aspects of Manchurian Incident and related aspects.
23. KATAMURA, Chu - No. 2658 Kami-Meguro 5 Chome, Meguroku, Tokyo. Former Major General with long service in Kwangtung Army.
- (a) The nationality of the witness is Japanese;
  - (b) This witness is able to testify concerning the origin and development of the "Manchurian Incident".
24. UEDA, Kenkichi - Oiso Kanagawa Prefecture. Former Commander-in-Chief of Kwangtung Army and concurrently ambassador to Manchukuo.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify to relationship between Manchukuo and Kwangtung Army.
25. SAKURAI, Takutaro - Tsuno-machi, Koyu-gun, Miyazaki Prefecture. Advisor to the Chinese Army at the time of the Marco Polo Incident.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify to facts concerning the "Incident" and the results of the incident and the developments thereafter.
26. MUDAGUCHI, Renza - Now in Singapore Prison. Formerly Lt. General serving in North China at the time of the China Incident.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify as to the measures taken on the part of the Japanese Army at the commencement of the China Incident.

20. YUZAWA, Michio - 228 Yoyogi-Sanya, Shibuyaku, Tokyo.  
Home Minister in Tojo Cabinet.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify as to the principles of the Tojo Cabinet as concerns the question of public relations.
21. KOMAI, Tokuzo - Horinouchi Namamura, Sakagun, Gunma Prefecture. Former president of General Affairs Bureau of Manchukuo.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify regarding the political position of Manchukuo as an independent state.
22. KANAI, Shoji - City of Ueda, Nagano Prefecture. Formerly an official of Manchukuo and Menshen Administrative Council.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify to economic aspects of Manchurian Incident and related aspects.
23. KATAKURA, Chu - No. 2658 Kami-Meguro 5 Chome, Meguroku, Tokyo. Former Major General with long service in Kwangtung Army.
- (a) The nationality of the witness is Japanese;
  - (b) This witness is able to testify concerning the origin and development of the "Manchurian Incident".
24. UEDA, Kenkichi - Oiso Kanagawa Prefecture. Former Commander-in-Chief of Kwangtung Army and concurrently ambassador to Manchukuo.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify to relationship between Manchukuo and Kwangtung Army.
25. SAKURAI, Takutaro - Tsuno-machi, Koyu-gun, Miyazaki Prefecture. Advisor to the Chinese Army at the time of the Marco Polo Incident.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify to facts concerning the "Incident" and the results of the incident and the developments thereafter.
26. MUDAGUCHI, Renza - Now in Singapore Prison. Formerly Lt. General serving in North China at the time of the China Incident.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify as to the measures taken on the part of the Japanese Army at the commencement of the China Incident.



27. WACHI, Tsungo - Now in Sugamo Prison. Former Colonel serving in wireless communication station in Owada.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify concerning a telegram from American Military Attache in Pekin to the American Staff of Operations with reference to the Marco Polo Incident.
28. MATSUMURO, Koryo - 4-389, Eifukuchō, Suginami-Ku Tokyo. Former Major General serving in China as Special Mission Organization.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify to important details concerning the conflict between China and Japan and also concerning the economic aspects of the occupation.
29. KAGESA, Teisho - Dai-Ichi Hospital in Tokyo. Former Lt. General serving as liaison officer by the Japanese Army and Wang-Ching-Wei Government.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify as to the matter of Wang Government with special reference to specific measures taken thereby.
30. KUMETARO, Honda - 1102 Kanimeguro 7 chome, Meguro-Ku, Tokyo. Ambassador to Wang-Ching-Wei Government.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify as to the relations between the Japanese Government and Wang Government.
31. ARITA, Hachiro - 426 Shimo-ochiai 1 chome, Yodobashi-Ku, Tokyo. Former Foreign Minister.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify as to the policies of the Japanese Government specifically and in detail.
32. ISHINATA, Sotaro - Seijo-machi, Setagaya-ku, Tokyo. Financial Advisor to Wang Government and former Finance Minister in HIRANUMA, TOJO, and KOISO Cabinet.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify concerning economic measures of the Wang Government and also relative to the Japanese economic policy toward China.

33. KUSUMOTO, Masataka - 151 Asahimachi 2 Chome Shimotsuna  
Cho Ibaraki Prefecture. Former Major General  
serving in Special Service Organization in China.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify to facts concerning the Narcotic  
traffic in China.
34. KURUSU, Sabro - Karui-Zawa, Nagano Prefecture.  
Special ambassador to the United States in 1941.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will be able to testify as to the  
Japanese-American negotiations in 1941.
35. SALTO, Yoshie - 42 Shoto-cho Shibuya-Ku, Tokyo.  
Advisor to Foreign Ministry during negotiations  
between Japan and America.
- (a) The nationality of the witness is Japanese;
  - (b) He is able to testify concerning the intentions and  
purposes concerning negotiations between Japan  
and the United States in 1941.
36. IWAKURO, Takao - 789 Denenchofu 2 Chome Ohmori-ku,  
Tokyo. Participated in drafting proposed agreement  
between America and Japan.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify regarding specific drafts and  
other matters pertaining to the negotiations between  
Japan and the United States.
37. YAMAMOTO, Kumaiichi- 9 Shimouma 3 Chome, Setagaya-Ku  
Tokyo. President of East Asia Section of Foreign  
Ministry and later Vice Minister for Greater East  
Asia Ministry in 1941.
- (a) The nationality of the witness is Japanese;
  - (b) This witness will testify regarding Japanese  
political situation in connection with negotiations  
between America and Japan.
38. TANAKA, Shinichi - Address to be supplied. Former  
Lt. General serving on army general staff prior  
to and during Pacific War.
- (a) The nationality of the witness is Japanese;
  - (b) The witness is able to testify regarding plans  
concerning Soviet Union and the objective of such  
plan.



39. ISHIMURA, Kwanji - Now in Tei-Shin Hospital, city of Tsurugaoka Prefecture. Former Lt. General serving in the Kwangtung Army.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify regarding various plans of operations concerning Russia and also relative to Five Year Plan in Manchuria and Japan.
40. YANO, Mitsuzi - Mishima-machi Umagin Ehime Prefecture. Former Colonel serving on Army General Staff in charge of military geography.
- (a) The nationality of the witness is Japanese;
  - (b) This witness is qualified to give evidence regarding the borderline between Mongolian Peoples Republic and Manchukuo.
41. JOSE, Laurel - Manila, Philippines. Former president of the Republic of the Philippines.
- (a) Philipino is the nationality of the witness.
  - (b) This witness will be able to testify as to certain measures taken by Japan during the war particularly with regard to economic and political policies.
42. MURATA, Shozo - Now in Sugamo Prison. Former Ambassador to the Philippine Islands.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify concerning the political and economic measures taken by the Japanese Government towards the Philippines.
43. TSUBOKAMI, Sadanobu - 14 Yoyogi Ohyama-cho, Shibuya-Ku, Tokyo, Japan. Former Ambassador to Thailand.
- (a) The nationality of the witness is Japanese;
  - (b) He will testify concerning relations between Thailand and Japan specifically as to the agreement of transit of Japanese Forces on 7 December 1941.
44. HARADA, Kusakichi - Now prisoner in Singapore. Former Lt. General and Commander-in-Chief in Java.
- (a) The nationality of the witness is Japanese;
  - (b) He will be able to testify to political and economic measures of Japan and concerning Dutch East Indies.
45. SUZUKI, Kunji - In Sugamo Prison. Former Colonel in charge of Prisoner of War Camps in Tokyo.

- (a) The nationality of the witness is Japanese;
- (b) This witness will testify as to the policy of the War Ministry regarding treatment of prisoner of war.

46. OHYAMA, Fumio - Nagatamachi 2 Chome Kojimachi-Ku  
Tokyo. Chief of Legal Section of War Ministry  
(Now First Demobilization Bureau)

- (a) The nationality of the witness is Japanese;
- (b) He will be able to testify to Japanese legislation concerning treatment of prisoners of war and to the rules of the military court established for the trials of prisoners of war.

DOCUMENTS

- 46 a. An order for the production of "Sick Bed Diary" of Tanaka, Ryukichi in the national Khonodai Hospital.
- 46 b. An order for the production of the record of official career of Isamu, Cho from the Cabinet record office.
- 46 c. An order for the production of all evidence and documents attached to the Roberts Commission Report on Pearl Harbor dated 23 January 1942.

It is respectively represented that the date upon which the attendance of the above witness will be required to testify cannot be accurately stated.

Submitted this 18th day of November 1946.

TOJO, HIDEKI

By his Counsel

ICHIRO KIYOSE

GEORGE F. BLEWETT